



USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 3/13/20

JAMES E. JOHNON  
Corporation Counsel of the City of New York

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

Elissa Fudim  
Senior Counsel  
Phone: (212) 356-2335  
efudim@law.nyc.gov

March 12, 2020

Hon. Lorna G. Schofield, U.S.D.J.  
United States District Courthouse  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

Re: Dr. Pemberton, et al. v. City of N.Y., 18-CV-7908-DAB

Dear Judge Schofield:

I write to seek clarification of the Court's docket entry text, dated March 5, 2020, directing that "[e]ither party may file a letter requesting a pre-motion conference at a later time." In order for the parties to avoid missing any deadlines for motion practice, defendants propose that any such pre-motion conference letters be considered timely if filed by May 22, 2020, which is thirty days following the settlement conference scheduled by Magistrate Judge Aaron for April 21, 2020. Plaintiffs' counsel submits that such pre-motion conference letters should be due no later than May 6, 2020 two weeks following the settlement conference. However, defendants seek thirty days because (i) defendants anticipate making several motions if this case does not resolve at the settlement conference, and (ii) the undersigned will be on trial before Judge Ramos in the case of Bleiwas v. City of N.Y., 15-CV-10046, from May 4-8, 2020 and will be preparing for that trial with witnesses in the two weeks preceding the trial. Defendants submit that an additional two weeks delay in filing the pre-motion letters will not dramatically change the timing of this case's resolution. Accordingly, defendants request that the parties have until May 22, 2020 to file any pre-motion conference letters with the Court.

Thank you for your consideration.

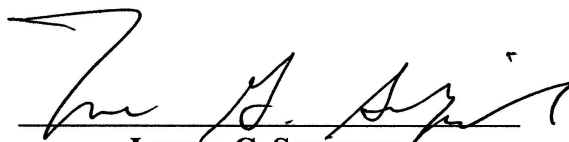
Respectfully Submitted,

The deadline to file letters requesting a pre-motion  
conference is May 22, 2020.

SO ORDERED.

Dated: March 13, 2020  
New York, New York

Elissa P. Fudim

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Elissa Fudim  
*Senior Counsel*